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Final

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: 2101-M Pond
740 Stevens Center Building, Room 2519
Richland, Washington

Meeting Held January 13, 1993

2101-M Pond Closure Plan, Unit Managers' Approval

Robert G. McLeod Date: 3-10-93
Robert G. McLeod, RL, Unit Manager, ERD/ERB

Not Present

Date: _____
Daniel L. Duncan, EPA Region 10, RCRA Program Manager

Elizabeth A. Wiley Date: 3-10-93
Elizabeth A. Wiley, Washington State Department of Ecology, Unit Manager

2101-M Pond Closure Plan, WHC Concurrence

Fred A. Ruck III Date: 2/10/93
Fred A. Ruck III, WHC, Contractor Representative

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment #1 - Summary of Discussion
- Attachment #2 - Agenda
- Attachment #3 - Attendance List
- Attachment #4 - Action Items
- Attachment #5 - Department of Ecology Notice of Deficiency for 2101-M-Pond,
Draft, dated August 04, 1992



Attachment #1

Summary of Discussion

2101-M Pond Closure Plan
Meeting Held January 13, 1993

Summary of Discussion

Review, Amend, Approve, and Distribute Prior Meeting Minutes: The draft December 15, 1992, Unit Manager Meeting Minutes were provided to the Ecology Unit Manager (Wiley).

Status of Prior Action Items (not agenda item):

7-11-91:2, WHC will review the Ecological Risk Assessment action item to determine if it is still necessary.

10-29-92:2, Action item is partially closed. It will be closed upon submittal of the new validation package to Ecology.

10-29-92:3, Data validation for ground water is covered under the draft NOD Comments on the NOD Response Table. Ecology (Wiley) stated that the groundwater reports (quarterly and annual) being submitted satisfy NOD #116. This action item is closed by mutual consent of the Unit Managers.

12-15-92:1, RL specifies, to separate the 2101-M Pond from the issue resolution, all NODs regarding this issue must be dropped.

Phase II Data: No new status.

NOD Comments: Ecology provided RL and WHC a set of draft comments on the Revision 1 NOD Response Table (Attachment #5). The draft comments were for the responses to NOD numbers 115, 116, 127, 132, 142, and (143) ~~143~~ ^{RLM} All the other responses would be accepted and considered closed. Of those submitted in the draft document #116 and #142 were discussed at the UMM. Ecology, (E. A. Wiley) stated that #116 was satisfied by the quarterly reported data and was considered closed. RL (R. N. Krekel) asked for clarification of NOD #142. Ecology required additional information before this could be discussed.

New Business: There were no new items of business. The next Unit Manager Meeting was scheduled for February 10, 1993.

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Attendance
Unit Manager Meeting
2101-M Pond Closure Plan

[illegible]

Attachment #4

Action Items

2101-M Pond Closure Plan
Unit Managers Meeting

Meeting Held January 13, 1993

Action Item

Description

7-11-91:2

Forward the completed Ecological Risk Assessment to Ecology by the first week in September 1990. Action: Jim Hoover.

OPEN

10-29-92:2

RL/WHC will reevaluate the Phase II data validation package concerning what information has or has not been reviewed and report the findings to Ecology. Action: J.A. Lerch (WHC)

OPEN

10-29-92:3

Ecology will determine what their data validation requirements will be for groundwater sample analysis. Action : E. A. Wiley (Ecology)

CLOSED 1/13/93

12-15-92:1

Ecology (Michelena) will work towards elevating the issue resolution topic out of the framework of the 2101-M Pond closure process. Action: T. Michelena (Ecology)

OPEN

ATTACHMENT #5

Handout #1
2101-M Pond water
1-13-93, p. 1/2

DEPARTMENT OF ECOLOGY
NOTICE OF DEFICIENCY FOR
2101-M-Pond
August 04, 1992

DRAFT

Page/line

115. A-2/13

RL/WHC Response: 40 CFR is titled Guidelines Establishing Test Procedures for the Analysis of Pollutants and provides guidance for test procedures to support NPDES (federal or state) for permits under Section 402 of the Clean Water Act of 1977. This does not provide action levels for concentration limits and is not applicable to soil.

Ecology Requirement: Methods that are established for water analyses can be modified to establish concentration limits for soils.

116. A-2/17

RL/WHC Response: The RCRA groundwater monitoring program at the Hanford site has been in existence since 1987, and has been negotiated and under the control of an Ecology Unit Manager. It is maintained that raw data as defined by Ecology is not needed for validation and is excessive.

Ecology Requirement: Provide necessary data as required for the quarterly groundwater monitoring program.

Resolved C.C.

127. B-30/40

RL/WHC Response: The fact that the holding times for these particular samples could not be documented is the reason the rainwater run-off ditch was included in the resampling that took place in 1991.

Ecology Requirement: Are all samples which exceeded holding times, those that are being resampled in the 1991 event? Please state if all samples that have exceeded holding times are those that were resampled.

132. B-36/44

RL/WHC Response: Resampling was conducted in June of 1991, which included cyanide as an analyte of interest (see Table E1-3, Appendix E-1).

Ecology Comment: Table E1-3 in Appendix E1 does not indicate that cyanide is an analyte of interest.

ATTACHMENT #5

142. B-106/27

RL/WHC Response: The RCRA groundwater monitoring program at the Hanford Site has been negotiated with and under the control of an Ecology Unit Manager. WAC 173-303-110 lists SW-846 methods as appropriate and approved methods for analyses, which includes SW-846 detection limits. WAC 173-303-645 does not list or reference any other methods or detection limits. Therefore the detection limits established by the EPA are appropriate.

Ecology Comment: Since this site is being considered for clean closure all ground water must be in compliance with MTCA standards.

no. water left in pond - point is moot if no water remains in pond = pond water as G.W.
36. B-108/11

RL/WHC Response: There is no evidence of radioactive contamination at the 2101-M Pond as shown in Appendix C-1 and D-2. If there were radioactive contamination in the groundwater, it would not be as a result of activities at the 2101-M Pond and would be remediated under CERCLA authority.

Ecology Comment: Table D2 does list several radioactive constituents above detection limits. There is no indication of how high above detection limits. Please provide Ecology with rad counts for those radioactive constituents found at the Pond, so that we may be able to determine if the pond can be clean closed.

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Distribution:

R.M. Carosino	RL	(A4-52)
C.E. Clark	RL	(A5-15)
W.G. Cox	WHC	(H6-23)
D.L. Duncan	EPA	(HW-106)
B.G. Erlandson	WHC	(H6-21)
K.R. Fecht	WHC	(H6-06)
G.D. Forehand	WHC	(B2-35)
R.D. Freeberg	RL	(A5-19)
G.W. Jackson	WHC	(H6-20)
R.N. Krekel	RL	(A5-15)
R.J. Landon	WHC	(H6-22)
P.J. Mackey	WHC	(B3-15)
R.G. McLeod	RL	(A5-19)
M.A. Mihalic	WHC	(L4-77)
S.M. Price	WHC	(H6-23)
F.A. Ruck III	WHC	(H6-23)
E.A. Wiley	Ecology	
B. Woods	EPA	(ES-095)

GSSC RCRA UMM File, Care of S. Lijek, A4-35

ADMINISTRATIVE RECORD (2101-M Pond) [Care of EDMC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Library,
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Environmental Protection Agency Region 10, Seattle, Washington 98101, HW-106

Please send comments on distribution list to Steve Lijek (A4-35), 376-0309.